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Attorneys for Defendant Google LLC

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION**

CHASOM BROWN, *et al.*, individually and
on behalf of themselves and all others
similarly situated

Plaintiffs,

v.

GOOGLE LLC,
Defendant.

Case No. 4:20-cv-03664-YGR-SVK

**DECLARATION OF TRACY GAO IN
SUPPORT OF DEFENDANT GOOGLE
LLC'S ADMINISTRATIVE MOTION TO
SEAL THE COURTROOM FOR
FEBRUARY 14, 2023 HEARING**

Referral: Hon. Susan van Keulen, USMJ
Hearing Date: February 14, 2023
Hearing Time: 2:00 P.M.

1 I, Tracy Gao, declare as follows:

2 1. I am a member of the bar of the State of California and an attorney for Quinn
3 Emanuel Urquhart & Sullivan, LLP, which serves as Google's outside counsel in this litigation. I
4 make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness,
5 I could and would testify competently thereto.

6 2. I submit this declaration in support of Google's Administrative Motion to Seal the
7 Courtroom for February 14, 2023 Hearing.

8 3. On February 9, 2023, counsel for Google requested Plaintiffs identify whether they
9 intended to discuss at the February 14, 2023 hearing information or material that Google has
10 designated as Confidential or Highly Confidential-Attorneys' Eyes Only, and whether Plaintiffs
11 opposed or did not take a position on Google's request to seal the courtroom for the February 14,
12 2023 hearing. Plaintiffs responded on February 10, 2023 that they intended to discuss such
13 information and material at the hearing. Plaintiffs also stated that, they recognized that the Court
14 previously sealed prior hearings on the same issue, and therefore did not take a position on Google's
15 motion to seal the courtroom.

16
17 I declare under penalty of perjury of the laws of the United States that the foregoing is true
18 and correct. Executed in Washington, D.C. on February 10, 2023.

19
20 DATED: February 10, 2023

QUINN EMANUEL URQUHART &
SULLIVAN, LLP

21 By /s/ Tracy Gao
22 Xi "Tracy" Gao

23 *Attorney for Defendant*
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